

## **REMARKS/ARGUMENTS**

The Applicants originally submitted Claims 1-95 in the application. In a preliminary amendment, the Applicants amended Claims 10-11, 13-14, 16, 23-24, 28-29, 34, 40-41, 43-44, 46, 53-54, 58-59, 64, 70-71, 73-74, 83-84, 88-89 and 91 to correct inadvertent grammatical errors. Additionally, the Applicants added Claims 96-101. In the present response, the Applicants have amended Claims 62-90 to correct informalities. No other claims were amended, added or canceled in the present response. Accordingly, Claims 1-101 are currently pending in the application.

### **I. Formal Matters and Objections**

The Examiner has objected to Claims 61-90 for containing informalities. In response, the Applicants have amended Claims 62-90 to correct the informalities. Accordingly, the Applicants respectfully request the Examiner to withdraw the objection of Claims 61-90.

### **II. Rejection of Claims 1-11, 21-22, 27, 31-41, 51-52, 57, 61-71, 81-82, 87, 91-95 and 97-101 under 35 U.S.C. §102**

The Examiner has rejected Claims 1-11, 21-22, 27, 31-41, 51-52, 57, 61-71, 81-82, 87, 91-95 and 97-101 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,112,183 to Swanson, *et al.* The Applicants respectfully disagree.

Swanson is directed to processing health care transactions through a common interface in a distributed computing environment. (*See* column 1, lines 9-12.) Swanson discloses a computing processing system having multiple applications within multiple systems. Each system implements the applications using a user interface tier 16, a business logic tier 18, a data access tier 20, and

communication interface 22. (See column 3, lines 11-25 and Figures 1A-1B.) The communication interface 22 provides a standard mechanism for inter-tier communication. (See column 4, lines 17-18.) Swanson, therefore, provides that health care transactions can originate from multiple sources or clients and can be sent to multiple servers within the computer processing system to complete the transactions. (See column 4, lines 42-67 and Figure 2.) The communication interface 22 provides a common interface for completing the transaction service. (See column 5, lines 8-13.)

Thus, Swanson provides a system for inter-communication between various applications within a computer processing system. Swanson does not, however, teach a method for accomplishing an enterprise event based on a unified collection of information realized from a plurality of disparate, ancillary systems including catching a message and converting content from the message to enterprise information using content conversion rules and recited in independent Claims 1, 31, 61 and 91. On the contrary, the communication interface 22 in Swanson provides information to a requested server in a format required by the server such that the server can process the transaction. Swanson specifically teaches that the communication interface 22 connects the requesting client with the appropriate server and passes information between the server and the client through client/server stubs generated during a request process. (See column 5, line 66 to column 6, line 8.) Thus, Swanson does not catch a transaction but directs transactions to appropriate servers and provides the transactions with the necessary information to allow the server to act upon the transaction.

Additionally, Swanson does not convert content from the transactions to enterprise information. On the contrary, Swanson provides information to allow the transactions to be processed by the appropriate servers. Content from the transactions is not converted to enterprise

information but instead remains in the data access tier 20 of the computer processing system. (See column 3, line 63 to column 4, line 3 and Figures 1A-1B.) Thus, instead of converting to enterprise information, Swanson teaches adapting transactions for processing by servers in the computer processing system wherein the transaction information continually remains within the multiple applications of the system.

Therefore, Swanson does not teach catching a message and converting a content from a message to enterprise information as recited in independent Claims 1, 31, 61 and 91. As such, Swanson does not disclose each and every element of independent Claims 1, 31, 61 and 91 and does not anticipating Claims 1, 31, 61 and 91 and Claims dependent thereon. Accordingly, the Applicants respectfully request the Examiner to withdraw the §102 rejection with respect to Claims 1-11, 21-22, 27, 31-41, 51-52, 57, 61-71, 81-82, 87, 91-95 and 97-101 and allow issuance thereof.

**II. Rejection of Claims 12-20, 23-26, 28-30, 42-50, 53-56, 58-60, 72-80, 83-86, 88-90 and 96 under 35 U.S.C. §103**

The Examiner has rejected Claims 12-20, 23-26, 28-30, 42-50, 53-56, 58-60, 72-80, 83-86, 88-90 and 96 under 35 U.S.C. §103(a) as being unpatentable over Swanson in view of U.S. Patent No. 6,377,162 to Delestienne, *et al.* The Applicants respectfully disagree.

As argued above, Swanson does not teach each element of independent Claims 1, 31, 61 and 91. Additionally, Swanson does not suggest each element of independent Claims 1, 31, 61 and 91 since Swanson does not suggest catching a message and converting content from the message to enterprise information. Instead, Swanson teaches adapting a transaction originated within application of a computer processing system through a communication interface to allow processing by an appropriate server and maintaining data associated with the transaction within the data access tier 20 of the computer processing system. (See column 3, line 63 to column 4, line 3; column 4, line 57 to column 5, line 12; and column 5, line 66 to column 6, line 10.) Thus, Swanson does not teach or suggest each and every element of independent Claims 1, 31 61 and 91.

Delestienne is directed to allowing field service engineers or personnel to access files and to interface directly with diagnostic equipment via a remote link through a centralized service facility. (See column 1, lines 5-16.) Delestienne has not been cited to cure the above deficiencies of Swanson but to teach the subject matter of the above dependent claims. Additionally, the Applicants do not find where Delestienne teaches or suggests catching a message and converting content from the message to enterprise information as recited in independent Claims 1, 31, 61 and 91. Accordingly, the cited combination of Swanson and Delestienne does not provide a *prima facie* case of obviousness of independent Claims 1, 31, 61 and 91 and Claims dependent thereon. Claims 12-20, 23-26, 28-30, 42-50, 53-56, 58-60, 72-80, 83-86, 88-90 and 96, therefore, are not unpatentable in view of the cited combination. Accordingly, the Applicants respectfully request the Examiner to withdraw the §103(a) rejection of Claims 12-20, 23-26, 28-30, 42-50, 53-56, 58-60, 72-80, 83-86, 88-90 and 96 and allow issuance thereof.

### **III. Comment on Cited References**

The Applicant reserves further review of the references cited but not relied upon if relied upon in the future.

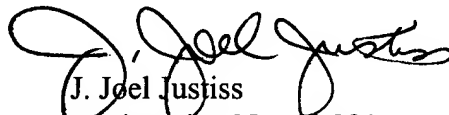
### **IV. Conclusion**

In view of the foregoing amendment and remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-101.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application.

Respectfully submitted,

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Dated: 6/17/05

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